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Attorney for Defendant  
JOSEPH CUARON

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	No. 2:20-cr-00112 JAM
	)	
Plaintiff,	)	STIPULATION AND ORDER
	)	FOR CONTINUANCE OF STATUS
	)	CONFERENCE
v.	)	
	)	
JOSEPH CUARON,	)	
	)	
Defendant.	)	
	)	
	)	

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**STIPULATION**

Plaintiff, United States of America, by and through its counsel, Assistant United States Attorney David Spencer, and Defendant Joseph Cuaron, by and through his counsel, David Fischer agree and stipulate to vacate the date set for status conference, August 3, 2021, at 9:30 a.m., in the above-captioned matter, and to continue the status conference for Joseph Cuaron only to August 10, 2021, at 9:30 a.m. in the courtroom of the Honorable John A. Mendez for a status conference and likely change of plea hearing.

By previous order, this case was set for status conference on August 3, 2021.

1 Defense counsel requests a continuance in order to further prepare, confer with his  
2 client, review the discovery, and otherwise prepare for trial or resolution of this case.  
3 The Government does not object to this continuance. Based upon the foregoing, the  
4 parties stipulate that that the ends of justice served by granting the continuance  
5 outweighs the best interest of the public and the defendants in a speedy trial. The parties  
6 also agree and stipulate that time under the Speedy Trial Act should be excluded as of  
7 August 3, 2021, through and including August 10, 2021; pursuant to 18 U.S. §3161  
8 (h)(7)(A) and (B)(iv)[reasonable time to prepare] and General Order 479 [Local Code  
9 T4]. Accordingly, the parties respectfully request the Court adopt this proposed  
10 stipulation  
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15 IT IS SO STIPULATED.  
16

17 Dated: July 22, 2021

PHILLIP A. TALBERT  
Acting United States Attorney

19 By: /s/ David Spencer  
20 DAVID SPENCER  
Assistant United States Attorney

22 Dated: July 22, 2021

/s/ David Fischer  
23 DAVID FISCHER  
24 Attorney for Defendant  
JOSEPH CUARON  
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**ORDER**

IT IS HEREBY ORDERED, the Court having received, read, and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, considering the exercise of due diligence. The Court finds the ends of justice are served by granting the requested continuance and outweigh the best interest of the public and defendants in a speedy trial. The Court orders from the time of the parties' stipulation, August 3, 2021, up to and including August 10, 2021, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) [reasonable time for counsel to prepare] and General Order 479 [Local Code T4]. It is further ordered the August 3, 2021 status conference shall be continued until August 10, 2021, at 9:30 a.m.

IT IS SO FOUND AND ORDERED this 23<sup>rd</sup> day of July, 2021.

DATED: July 23, 2021

/s/ John A. Mendez

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THE HONORABLE JOHN A. MENDEZ  
UNITED STATES DISTRICT COURT JUDGE